

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

UNITED STATES OF AMERICA

v.

JORGE SALINAS
aka "COACH"

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§

Criminal No. 7:24-CR-168

**GOVERNMENT'S NOTICE OF INTENTION TO INTRODUCE
EVIDENCE PURSUANT TO FEDERAL RULE OF EVIDENCE 404(b)**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, the United States of America, by and through Alamdar S. Hamdani, United States Attorney for the Southern District of Texas, and the undersigned Assistant United States Attorney, and hereby gives notice of our intention to introduce the hereinafter described evidence pursuant to Federal Rule of Evidence 404(b), in its case-in-chief or otherwise, in the trial of the above-styled case for all purposes permitted by said rule, and specifically as proof of motive, opportunity, intent, preparation, plan, knowledge, identity and absence of mistake or accident:

**The Defendant Corruptly Engaged a Co-Conspirator to Solicit Things of Value for Official
Acts from Prospective Vendors**

Solicitation of Bribes from Energy Company

1. On several occasions in and around October 2019, the defendant, who at the time was a sitting Edinburg City Council member in Edinburg, Texas, engaged in discussions, along with a co-conspirator, with representatives of an energy company regarding the defendant taking official acts to help that energy company obtain contracts with the City of Edinburg, which would have been financially rewarding to the energy company. During these interactions, the defendant

requested things of value from the energy company through the co-conspirator as a bribe in exchange for the defendant taking certain official acts to benefit the energy company.

Solicitation of Bribes from Law Firm

2. On several occasions in and around October and November 2019, the defendant, who at the time was a sitting Edinburg City Council member in Edinburg, Texas, engaged in discussions, along with a co-conspirator, with an attorney at a Houston-based tax law firm, regarding the defendant taking official acts to help that law firm obtain debt collection contracts with the City of Edinburg, which would have been financially rewarding to the law firm. During these interactions, the defendant requested things of value from this attorney through the co-conspirator as a bribe in exchange for the defendant taking certain official acts to benefit the law firm.

Solicitation of Bribes from Insurance Companies

3. On several occasions between on or about May through December 2019, the defendant, who at the time was a sitting Edinburg City Council member in Edinburg, Texas, engaged in discussions, along with a co-conspirator, with representatives of two separate insurance companies regarding the defendant taking official acts to help each company obtain an insurance contract(s) with the City of Edinburg, which would have been financially rewarding to each of these businesses. During this time, the defendant instructed representatives of these insurance companies that they each needed to hire the co-conspirator as their political consultant. The defendant further implied to each company that such hiring of the co-conspirator was a necessary step for their respective businesses to obtain contracts from the City of Edinburg. Representatives of each company subsequently paid the co-conspirator with the understanding that the money they

paid would influence the defendant to use his official position and take official acts to favor each company's financial and business interests regarding business they might do with the City of Edinburg.

Conclusion

4. The United States believes much of the evidence detailed above is intrinsically intertwined with the evidence supporting the underlying charged offenses and should be admissible in our case-in-chief for that reason. Nonetheless, and out of an abundance of caution, we are providing this notice to admit this evidence under F.R.E. 404(b), even though we do not believe the bulk of the evidence needs to be admitted under that Rule.

5. For anything listed above that the United States or the Court does not believe to be intrinsically intertwined, the United States believes this prior alleged misconduct of the defendant demonstrates intent, knowledge, absence of mistake or accident, and identity. In the present case, the co-conspirator detailed above (whom the United States intends to call to testify at trial) and the defendant had a previous "working relationship" where the co-conspirator would act as a representative for the defendant toward individuals who wished to establish business relationships with the City of Edinburg, and/or obtain contracts with the City of Edinburg, which could be financially beneficial to them and their businesses. As part of these interactions, the co-conspirator and the defendant would engage in a common plan or scheme meant to leverage the opportunity defendant's public office afforded him to corruptly obtain things of value in exchange for him taking certain official acts.

6. The interactions cited above show that during multiple events that the defendant used the co-conspirator to meet with businesses and individuals as part of a scheme where the co-

conspirator would recruit those persons to provide money or other things of value to the defendant in exchange for the defendant taking certain official acts to their benefit. The co-conspirator was the conduit through which the bribes would flow, and the defendant used him in an apparent attempt to separate himself from the illegal conduct. This evidence will also go directly to the issue of corrupt intent, which is an essential part of the government's required proof in this case, and is also relevant to rebut any potential defense of lack of knowledge or agreement by the defendant regarding the charged offenses.

For the reasons stated above, we believe the evidence detailed above should be admissible in our case-in-chief, and the United States hereby notices the Court and the defendant of its intention to introduce this evidence against the defendant in our case-in-chief pursuant to Rule 404(b) of the Federal Rules of Evidence.

Respectfully Submitted,

ALAMDAR S. HAMDANI
UNITED STATES ATTORNEY

By: /s/ Robert L. Guerra, Jr.
ROBERT L. GUERRA, JR.
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Government's Notice of Intention to Introduce Evidence Pursuant to Federal Rule of Evidence 404(b) was given on this 12th day of July, 2024, to Jesus Villalobos, attorney for defendant, via ECF filing.

/s/ Robert L. Guerra, Jr.
ROBERT L. GUERRA, JR.
Assistant United States Attorney